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5
6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 * * *

9 MICHAEL ERWINE,

Case No.: 3:18-cv-00461-RCJ WGC

10 Plaintiff,

vs.

11 CHURCHILL COUNTY, a political
12 subdivision of the State of Nevada,
13 CHURCHILL COUNTY SHERIFF
14 BENJAMIN TROTTER, and DOES 1
through 10 inclusive;

**PLAINTIFF'S PROPOSED VOIR
DIRE**

15 Defendants.
16 _____/

- 17
- 18 1. Do any of you recognize, or have you heard of, plaintiff Michael Erwine?
 - 19 2. Do any of you recognize, or have you heard of, defendant Benjamin Trotter?
 - 20 3. Do you or have you ever lived in the Churchill County?
 - 21 4. Do you or have you ever worked for the Churchill County?
 - 22 5. Do you or have you ever had significant ties to the Churchill County?
 - 23 6. Does anyone know the judge and/or any of the courtroom employees?
 - 24 7. Does anyone know any of the attorneys?
 - 25 8. Does any member of the jury panel know another panel member?
 - 26 9. The court staff passed along a list of witnesses expected to testify at trial. Do
 - 27 any of you know the witnesses?
 - 28 10. Does anyone read the USA Today?

- 1 11.Has anyone ever served as a juror in a criminal trial?
- 2 12.Has anyone ever served as a juror in a civil trial?
- 3 13.Has anyone ever served as a grand juror?
- 4 14.If you have served as a juror, did the jury reach a verdict?
- 5 15.Does anyone need an accommodation to help you listen or sit during the trial?
- 6 16.Has anyone ever been involved in a legal dispute – meaning a claim or a law
7 suit – other than a divorce?
- 8 17.Does anyone have a family member who has been involved in a legal dispute
9 – meaning a claim or a law suit – other than a divorce?
- 10 18.Does anyone have a friend who has been involved in a legal dispute – meaning
11 a claim or a law suit – other than a divorce?
- 12 19.If you, a family member, or friend has been involved in a legal dispute, did the
13 dispute involve an employment matter?
- 14 20.Does anyone have specialized knowledge – meaning education or training – in
15 police practices or law?
- 16 21.Has anyone, or a close family member, ever had difficulty in finding a job?
- 17 22.Has anyone ever been fired from a job?
- 18 23.Has anyone ever supervised other employees as part of their job?
- 19 24.Has anyone here ever made the decision to fire another employee?
- 20 25.Have you ever worked for a City or other government entity?
- 21 26.Has a family member worked for a City or other government entity?
- 22 27.Have you had a close friend who worked for a City or other government entity?
- 23 28.Do you have a favorable opinion of the police?
- 24 29.Have you ever done police work in any capacity?
- 25 30.Has a family member ever done police work in any capacity?
- 26 31.Have you had a close friend ever done police work in any capacity?
- 27 32.Have you ever served as an elected or appointed public official in any capacity?
- 28

1 33.Has a family member run for or served as an elected or appointed public official
2 in any capacity?

3 34.Have you had a close friend who ran for or served as an elected or appointed
4 public official in any capacity?

5 35.Have you ever read or heard anything about this case or the parties online or
6 anywhere else?

7 36.Do you think the following argument is valid:

8 a. If college admissions processes are fair, then affirmative action laws are
9 no longer necessary. College admissions are not fair, so affirmative
10 action laws are necessary.

11 37.Do you think the following argument is valid:

12 a. If less severe punishments prevent crime, then capital punishment
13 should not be used. Less severe punishments do not deter crime, so
14 capital punishment should be used.

15 38.Have you ever filed any type of grievance against an employer?

16 39.Have you ever filed a grievance about the conduct of a supervisor or fellow
17 employee?

18 40.Have you ever filed a grievance about the conduct of a public official?

19 41.Have you ever felt a supervisor evaluated your performance unfairly?

20 42.Have you ever been the victim of biased treatment on the job?

21 43.Have you ever been defamed?

22 44.Have you ever had a former employer give a negative reference?

23 **DATED** this Thursday, February 10, 2022:

24 By: /s/ Luke Busby, Esq.
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CERTIFICATE OF SERVICE

Pursuant to FRCP 5, I certify that on the date shown below, I caused service to be completed of a true and correct copy of the foregoing pleading by:

- ☐ personally delivering;
- ☐ delivery via Reno/Carson Messenger Service;
- ☐ sending via Federal Express (or other overnight delivery service);
- ☐ depositing for mailing in the U.S. mail, with sufficient postage affixed thereto; or,
- ☒ delivery via electronic means (fax, eflex, NEF, etc.) to:

Katherine F. Parks, Esq.
Thorndal Armstrong
6590 S. McCarran Blvd. Suite B.
Reno, NV 89509
Attorney for the Defendant

DATED this Thursday, February 10, 2022

By: /s/ Luke Busby, Esq.
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